

FILED

MAR 22 2013

**Board of Vocational Nursing
and Psychiatric Technicians**

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7

8 **BEFORE THE**
BOARD OF VOCATIONAL NURSING AND PSYCHIATRIC TECHNICIANS
9 **DEPARTMENT OF CONSUMER AFFAIRS**
STATE OF CALIFORNIA

10 In the Matter of the Accusation Against:

Case No. PT-2011-3884

11 **MERCEDES ALEMAN AGUDO**
12 **1556 N. Kenwood Avenue**
13 **San Bernardino, CA 92404**

A C C U S A T I O N

14 **Psychiatric Technician License No. PT**
15 **30401**

Respondents.

16
17 Complainant alleges:

18 **PARTIES**

19 1. Teresa Bello-Jones, J.D., M.S.N., R.N. (Complainant) brings this Accusation solely in
20 her official capacity as the Executive Officer of the Board of Vocational Nursing and Psychiatric
21 Technicians, Department of Consumer Affairs.

22 2. On or about May 26, 1999, the Board of Vocational Nursing and Psychiatric
23 Technicians issued Psychiatric Technician License Number PT 30401 to Mercedes Aleman
24 Agudo (Respondent). The Psychiatric Technician License expired on December 31, 2012, and
25 has not been renewed.

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1 fraudulently claiming, receiving and accepting wages from the state for hours that she had not
2 actually worked.

3 b. Specifically, Respondent conspired with Romero to submit false information to the
4 State Controller's Office which indicated that Respondent was working a full-time schedule and
5 exorbitant amounts of overtime at PSH when, in fact, Respondent worked few regular hours each
6 month and little to no overtime. As a result of these fraudulent activities, Respondent was
7 routinely issued paychecks which grossly overstated the amount owed to her by the state.
8 Respondent deposited each of those checks into her credit union account, later withdrawing
9 substantial portions of the stolen income to share with Romero. Romero admitted his
10 involvement in the conspiracy with Respondent when questioned by officers of the Patton State
11 Hospital Police Department.

12 PRAYER

13 WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged,
14 and that following the hearing, the Board of Vocational Nursing and Psychiatric Technicians
15 issue a decision:

16 1. Revoking or suspending Psychiatric Technician License Number PT 30401, issued to
17 Mercedes Aleman Agudo;

18 2. Ordering Mercedes Aleman Agudo to pay the Board of Vocational Nursing and
19 Psychiatric Technicians the reasonable costs of the investigation and enforcement of this case,
20 pursuant to Business and Professions Code section 125.3;

21 3. Taking such other and further action as deemed necessary and proper.

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23 DATED: **MAR 22 2013**

24 
TERESA BELLO-JONES, J.D., M.S.N., R.N.

25 Executive Officer

26 Board of Vocational Nursing and Psychiatric Technicians

27 Department of Consumer Affairs

28 State of California

Complainant

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